REMARKS

Claims 1-20 were submitted for examination. In this Office Action, Claims 1-20 are examined and rejected under 35 USC 103(a) as being unpatentable over Kuwahara (US Patent No.: 6,202,072, hereinafter "Kuwahara") in view of Christiano (US Patent No.: 5,386,369, hereinafter "Christiano"), claims 11 and 13 are further rejected in view of PCT Publication No. WO 94/14122 to Arn, hereinafter Arn.

The Examined is appreciated for his thoughtful review and comments. In the foregoing amendments, some paragraphs in the Specification have been amended to correct some informalities, and Claim 1-8, 14 and 20 are amended to further distinguish from the cited references. Reconsideration of Claims 1-20 is respectfully requested in view of the following remarks.

To reject claim 1-20, the Examiner combines Kuwahara and Christiano. Kuwahara relates to converting a plain text document to a generalized markup language document while Christiano relates to a software metering system. The Applicants respectfully contest the combination of the references as it is believed that there is no motivation to combine these references in the manner proposed by the Examiner. Nevertheless, even if these references were to be combined, the combination would still fail to teach or suggest the combined features recited in the Claims 1, 14 and 20. It is believed that the once-amended Claims 1, 14 and 20 clearly demonstrate their corresponding distinctions over the references.

As amended, Claim 1 recites:

> activating a counter having a numbering system <u>counting a number of pages being converted in the document conversion process;</u>
> converting an unstructured document into <u>an output presentation in a first display,</u> the output presentation including a number of displayable objects and respective decoration attributes about each of the displayable objects;
> receiving a definition file including document type definitions (DTD) relating to the unstructured document;
> <u>generating a tree structure in a second display showing hierarchical relationships of document elements from the DTD;</u>
> associating one of the document elements in the tree structure with

one of the displayable objects in the output presentation in the first
    display;
generating a modified output presentation including association
    information of each one of the displayable objects being
    associated with one of the definitions in the definition file; and
causing the counter to increment as soon as the modified output
    presentation is to be saved.

(*emphasis added*)

The features are originally supported between lines 25 of page 18 to line 5 of page 19 and FIG. 3B in the Specification. In particular, when a DTD (Pool) 328 is loaded in FIG. 3B, a (XML) tree structure 330 is generated or derived from the DTD 328 and subsequently shows the hierarchical relationships of the document elements. It is important to note that the tree structure 330 is generated from the DTD Pool 328. FIG. 3B also shows the output presentation 322 is in the first display 322 and the tree structure 330 is in the second display 324. Further the tree structure 330 is the one (not the DTD Pool 328) used to associate one of the document elements therein with one of the displayable objects in the output presentation 322.

In contrast, Kuwahara receives a DTD but fails to teach or suggest to generate a tree structure from the DTD. In addition, Kuwahare does not teach the display of the tree structure. As described above, the display of the tree structure is important as it is used to facilitate the association of the displayable objects with the document elements in the tree structure. Further Kuwahara does not teach a counting device to measure the use of the conversation process, which has been agreed by the Examiner.

Christiano does show the use of "dongle" to control the use of software that may be licensed and focuses on the control of the dongle itself. However, Christiano fails to specify to count an output of the software. As recited in Claim 1, a counter functions only when a modified output presentation is to be saved, the counter does not count the use when the conversation is in process. In other words, a counter having a numbering system <u>counting a number of pages being converted in the document conversion process not the document conversion process itself.</u>

The Examiner agrees that Kuwahara does not specifically teach Claims 11 and 13 thus Arn is cited to reject the claims. The Applicant respectfully disagree such combination as it is clearly shows that Kuwahara and Arn are doing two opposite things. Kuwahara relates to converting a plain text document to a generalized markup language document while Arn shows the display of structured documents (i.e., markup language files). Further, the Applicant wishes to point out that neither Arn nor Kuwahara teaches "generating a tree structure in a second display showing hierarchical relationships of document elements from the DTD" which is clearly evidenced in FIG. 3B of the pending application.

Accordingly, the Applicant respectfully submits that these features recited in the once-amended Claim 1 are neither taught nor suggested in Kuwahara and Christiano, viewed alone or in combination, and Claim 1 shall be allowable over the cited references. Reconsideration of claims 1-13 is respectfully requested.

In additional to the features recited in Claim 1, the once-amended Claim 14 further recites "the DTD itself is also displayed independently in the second display", wherein both the first and second displays are included in the integrated graphic environment, which is supported in FIG. 3B. With the reasons provided above to support Claim 1, the Applicant respectfully submits that the once-amended Claim 14 are neither taught nor suggested in Kuwahara and Christiano, viewed alone or in combination, and Claim 14 shall be allowable over the cited references. Reconsideration of claims 14-19 is respectfully requested.

In additional to the features recited in Claim 1, the once-amended Claim 20 further recites:

> . . .
>
> wherein the structure file format is generated from a tree structure shown in a second display, the tree structure originally generated from a document type definitions relating to the unstructured document and subsequently containing association information of at least one of the displayable objects being associated with one of definitions in the document type definitions by manually associating one of the displayable objects with one of document elements in the tree structure...

(*emphasis added*)

With the reasons provided above to support Claim 1, the Applicant respectfully submits neither Kuwahara nor Christiano, viewed alone or in combination, have taught or suggest the features underlined as above in the once-amended Claim 20. In one aspect, Claim 20 may be understood to recite that three items are being displayed, the displayable objects in a first display, the document type definitions and the tree structure in the second display. Accordingly, it is believed that Claim 20 shall be allowable over the cited references. Reconsideration of claim 20 is respectfully requested.

In view of the above amendments and remarks, the Applicant believes that Claims 1-20 shall be in condition for allowance over the cited references. Early and favorable action is being respectfully solicited.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplementary Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at (408)777-8873.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to "Commissioner of Patents and Trademarks, Washington, DC 20231", 06/24/2004.

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Respectfully submitted;

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